ID 09061
No Date
5a

DOCUMENTARY EXHIBIT INDEX
X83-04-02-3008
RATHDRUM, IDAHO

Exhibit

1. Two-page document, EPA Form 8700-12, Notification of Hazardous Waste Activity, signed by Thomas A. Drexler, dated September 14, 1980.

2. One-page document, EPA Form 8700-12B, Acknowledgement of Notification of Hazardous Waste Activity, from EPA to Drexler Enterprises, dated October 29, 1980.

3. Fifteen pages, EPA Form 3510-1, General Information Consolidated Permit Program, submitted for ARRCOM, Inc., signed by W. A. Pickett on November 17, 1980, also EPA Form 3510-1, General Information Consolidated Permit Program for Drexler Enterprises, Inc., signed by W. A. Pickett on November 17, 1980.

4. Letter from Wally Drexler to Linda Dawson dated February 3, 1981.

5. One-page letter from James Ivers from ARRCOM, Inc. to Linda Dawson dated February 5, 1981.

6. One-page telephone call report from Linda Dawson to James Ivers of ARRCOM Oil dated August 4, 1981.

7. One-page letter from Tobias Hegdahl to Wally Drexler dated August 13, 1981.

8. One-page telephone use report call from Al Pickett to Linda Dawson dated December 3, 1981.

9. Call from Linda Dawson to Wally Drexler dated December 3, 1981.

10. Two-page letter from Linda Dawson to Alan Pickett dated December 4, 1981.

11. Two-page letter from Linda Dawson to Alan Pickett, ARRCOM, Inc., January 11, 1982.

12. Record of phone call from Linda Dawson to Al Pickett, ARRCOM, Inc. dated February 5, 1982.

13. Two-page letter from Ken Feigner to Alan Pickett, ARRCOM, Inc., dated February 9, 1982.

14. Record of telephone call from Linda Dawson to David Drexler dated March 4, 1982.

15. Record of telephone communication from Linda Dawson to Al Pickett, ARRCOM, Inc., March 5, 1982.

15. Record of telephone communication from Linda Dawson to Al Pickett, ARRCOM, Inc., March 5, 1982.

16. Record of field trip for site inspection dated June 9, 1982 and June 22, 1982 from Mike Brown to Betty Wiese.

17. Record of conference between Mike Brown, George Hofer and Warren Bingham dated June 22, 1982.

18. Handwritten letter from Warren Bingham to George Hofer dated July 1, 1982.

19. Five-page trip report dated July 20, 1982 from Mike Brown.

20. Fourteen-page trip report from Mike Brown, date of inspection July 20, 1982 at Rathdrum, Idaho.

21. Nine pages of collection reports identifying five samples taken by Athena Lalikos at the Rathdrum site in Idaho on July 20, 1982.

22. Fifteen pages of analytical results indicating the results of samples taken by Athena Lalikos at the Rathdrum site on July 20, 1982.

23. One-page document representing Chain of Custody Record of samples taken by Athena K. Lalikos at the Rathdrum site on July 20, 1982.

24. One-page document entitled "Field Sample Data Sheet."

25. Four pages containing letters from James Harris to Michael Brown which encloses a hazardous waste manifest for a waste shipment from Anaconda Aluminum to ARRCOM Oil in Rathdrum, Idaho.

26. One-page letter from John Hamill to George Drexler dated December 27, 1982.

27. One-page letter from L. Edwin Coate to George W. Drexler transmitting Complaint and Compliance Order; page 2 of that exhibit shows the certified return receipt signed an employee of George Drexler; page 3 of exhibit 27 shows the Affidavit of Service upon George Drexler at the Federal Penitentiary at Fort Worth.

28. Two-page document from L. Edwin Coate to ARRCOM, Inc., which is the transmittal letter to the Complaint and Compliance Order; the second page shows the certified return indicating receipt by ARRCOM, Inc.

29. Two-page document from L. Edwin Coate to Mr. Warren Bingham which is the transmittal letter to the Complaint and Compliance Order; page two of this document shows the receipt for certified mail signed by Mr. Bingham.

30. Two-page document dated April 27, 1983, letter from L. Edwin Coate to W. A. Pickett transmitting the Complaint and Compliance Order; page two of Exhibit 30 is a signed and notarized Affidavit of Personal Service upon Mr. Pickett.

31. Dated April 27, 1983, letter from L. Edwin Coate to Mr. Thomas Drexler transmitting the Complaint and Compliance Order; page two of Exhibit 31 is a signed and notarized Affidavit of Service showing personal service upon the wife of Thomas Drexler.

32. Twelve page Complaint and Compliance Order sent to all Respondents in this proceeding.

33. This is a one-page penalty calculation work sheet used by Michael Brown to calculate the proposed penalty.

34. Two-page letter from Mr. Warren Bingham to L. Edwin Coate dated May 14, 1983.

35. Record of a conference between Michael Brown, George Hofer, Ken Feigner, Lanita Bingham, Warren Bingham and Mike Garcia dated May 26, 1983.

36. Letter from Warren Bingham to Ken Feigner dated May 27, 1983 - one page.

37. One-page letter from W. A. Pickett to EPA dated June 27, 1983.

38. Four-page letter from Thomas A. Drexler to George Hofer, EPA, dated June 27, 1983.

39. One-page letter, W. A. Pickett to Ken Feigner dated June 27, 1983.

40. Twenty pages of documents sent by W. Donald Lilly from United Coatings indicating chemical transportation manifests showing shipments of hazardous waste to the ARRCOM facility at Rathdrum on at least nine occasions.

41. One-page summary of the chemical analyses performed at the ARRCOM Rathdrum site with attached map showing where sample locations were. (This is actually a 3-page document.)

42. One-page revised penalty calculation work sheet used by Michael Brown to calculated the proposed penalty.

to Vi cc
2/11/81

Arrcom Oil Co., Inc.
701 Bozarth
P.O. Box 56
Woodland, Wa. 98674
(206) 225-9733

February 5, 1981

EPA Region X
M/S 530-A
1200 Sixth Ave.
Seattle, WA 98101

Attn: Linda Dawson

Drexler Rathdrum, Id

Dear Ms Dawson:

Enclosed is the ammended version of our Form 3 for the Arrcom facility. I will submit the same for DEI later as it will require a different signature. At that time I will also submit the request for the "ISCL".

Thank You.

Yours truly,

James Cleve Ivers
Purchasing Agent
Arrcom, Inc.

JCI/lw
(Encl.)

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION: DREXLER Enterprises Inc

II. INSTALLATION MAILING ADDRESS: Rt. 3 Box 258-A6 Rathdrum ~~Idaho~~ 83858

PLEASE PLACE LABEL IN THIS SPACE

III. LOCATION OF INSTALLATION: ~~Wo[illegible]~~ Rathdrum Idaho Rt 3 Box 258-A6 83858

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER | APPROVED | DATE RECEIVED (yr., mo., & day)

F | T/A: 1 | C | 900820

AUG 28 80 00026

I. NAME OF INSTALLATION

DREXLER ENTERPRISE INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 RT 3 BOX 258-A6

CITY OR TOWN: 4 RATHDRUM | ST.: ID | ZIP CODE: 83858

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 ~~P.O. Box 56~~ – ~~RT 3 Box 258-A6~~ Same

CITY OR TOWN: 6 W~~ORLEY~~ RATHDRUM ~~ID~~ ~~ST.~~ ~~ZIP CODE~~

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 THOMAS A. DREXLER VICE PRES | PHONE NO. *(area code & no.)*: 208-687-0607

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 GEO. W. DREXLER

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON–FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [X] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA EXHIBIT 1
IDAHO

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

W | | | T/A | C | 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
K049					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
K049					

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☒ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Thomas A. Dreyler	THOMAS A. DREYLER VICE PRES	9-14-80

EPA Form 8700-12 (6-80) REVERSE

DETACH

DETACH

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ *IDD000800961

DREXLER ENTERPRISES INC
TR 3 BOX 258-A6
RATHDRUM ID 83858

INSTALLATION ADDRESS ➤

TR 3 BOX 258-A6
RATHDRUM ID 83858

EPA Form 8700-12B (4-80)

10/29/80

EPA EXHIBIT 2
IDAHO

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F | I D D 0 0 0 8 0 0 9 6 1 | T/A | C | D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

RECEIVED
JAN 6 1982
Region
PLEASE PLACE LABEL IN THIS SPACE
PROGRAM DEVELOPMENT SECTION

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ~~DREXLER ENTERPRISES INC~~ ARRCOM INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*: 2 PICKETT ALAN SECRETARY

B. PHONE *(area code & no.)*: 509 624 7719

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 PO BOX 125

B. CITY OR TOWN: 4 OTIS ORCHARDS

C. STATE: WA

D. ZIP CODE: 99027

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 5 MI E STATE LINE HWY 53

B. COUNTY NAME: KOOTENAI

C. CITY OR TOWN: 6 RATHDRUM

D. STATE: ID

E. ZIP CODE: 83858

F. COUNTY CODE *(if known)*: 055

EPA EXHIB 3- IDAHO

CONTINUE ON REVER

EPA Form 3510-1 (6-80)

REVISED

1. Water well
2. T-48 2,000 Gal. Re-refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T-28 1,200 Gal. Electric heater tank
12. 48" shaker
13. Shaker building
14. T-144 6,000 Gal. Underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")* FOR EACH PROCESS ENTERED HERE. INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

EPA Form 3510-3 (6-80)

Continued from page 2.
If Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
I D D 0 0 0 8 0 0 9 6 1	W DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	1,250,000 Lbs	G	S02	
2			~~B~~	~~S02~~	
3	F003	20,000 80	G	S02	
4	F005	5,000 20	G	S02	
5	F005	5 1.%	Y	S03	Residue (sand, metals sludge, paint filter from all products
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

CO.04

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1), ON PAGE 3

EPA I.D. NO. (enter from page 1)

D | 1 0 0 0 0 0 8 0 0 9 6 1

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
47 48 01 2	117 49 00 0

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E DREXLER ENTERPRIZES INC.	509-624-7719

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F P.O. BOX 125	G OTIS ORCHARDS	WA	99027

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F | I D D 0 0 0 8 0 0 9 6 1

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: DREXLER ENTERPRISES INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 PICKETT ALAN SECRETARY	509 624 7719

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 PO BOX 125

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 OTIS ORCHARDS	WA	99027

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 5 MI E STATE LINE HWY 53

B. COUNTY NAME

KOOTENAI

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 RATHDRUM	ID	83858	055

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2992 (specify) OILS LUBRICATING; RE-REFINING	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: DREXLER ENTERPRIZES INC

B. Is the name listed in Item VIII-A also the owner? ☑ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE
R (specify)

D. PHONE (area code & no.): A 509 624 7719

E. STREET OR P.O. BOX: PO BOX 125

F. CITY OR TOWN: BOTIS ORCHARDS

G. STATE: WA

H. ZIP CODE: 99027

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N	P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. (D)

XII. NATURE OF BUSINESS (provide a brief description)

To transport and re-process (dry and filter) used oil into a useable fuel product.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett Secretary	W. A. Pickett - Secretary	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

Form Approved. OMB No. 158-S80-...

FORM 3510-3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA)

I. EPA I.D. NUMBER: F | I | D | D | 0 | 0 | 0 | 8 | 0 | 0 | 9 | 6 | 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED | DATE RECEIVED (yr., mo., & day) | COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (*place an "X" below and provide the appropriate date*)

[X] 1. EXISTING FACILITY (*See instructions for definition of "existing" facility. Complete item below.*)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (*use the boxes to the left*): 8 | 80 | 01 | 01

[ ] 2. NEW FACILITY (*Complete item below.*)

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (*place an "X" below and complete Item I above*)

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (*including its design capacity*) in the space provided on the form (*Item III-C*).

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (*barrel, drum, etc.*)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (*the volume that would cover one acre to a depth of one foot*) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (*Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.*)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (*shown in line numbers X-1 and X-2 below*): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | T/A | 1

LINE NUMBER	A. PROCESS CODE (*from list above*)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (*specify*)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (*enter code*)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S02	67,000	G	
2	S03	70	Y	
3				
4				
5				
6				
7				
8				
9				
10				

...tinue from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS COD... FOR DESCRIBING OTHER PROCESSES (code "T0... FOR EACH PROCESS ENTERED HERE. INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristic or toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

...page 2.
...this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
1 D D 0 0 0 8 0 0 9 6 1	DUP / DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	1250000	G	S02	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

(continued from the front)

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

EPA I.D. NO. (enter from page 1)

I D 0 0 0 0 8 0 0 9 6 1

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
47 48 01 2	116 48 000

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E DREXLER ENTERPRIZES INC.	509-624-7719

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F P.O. BOX 125	G OTIS ORCHARDS	WA	99027

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

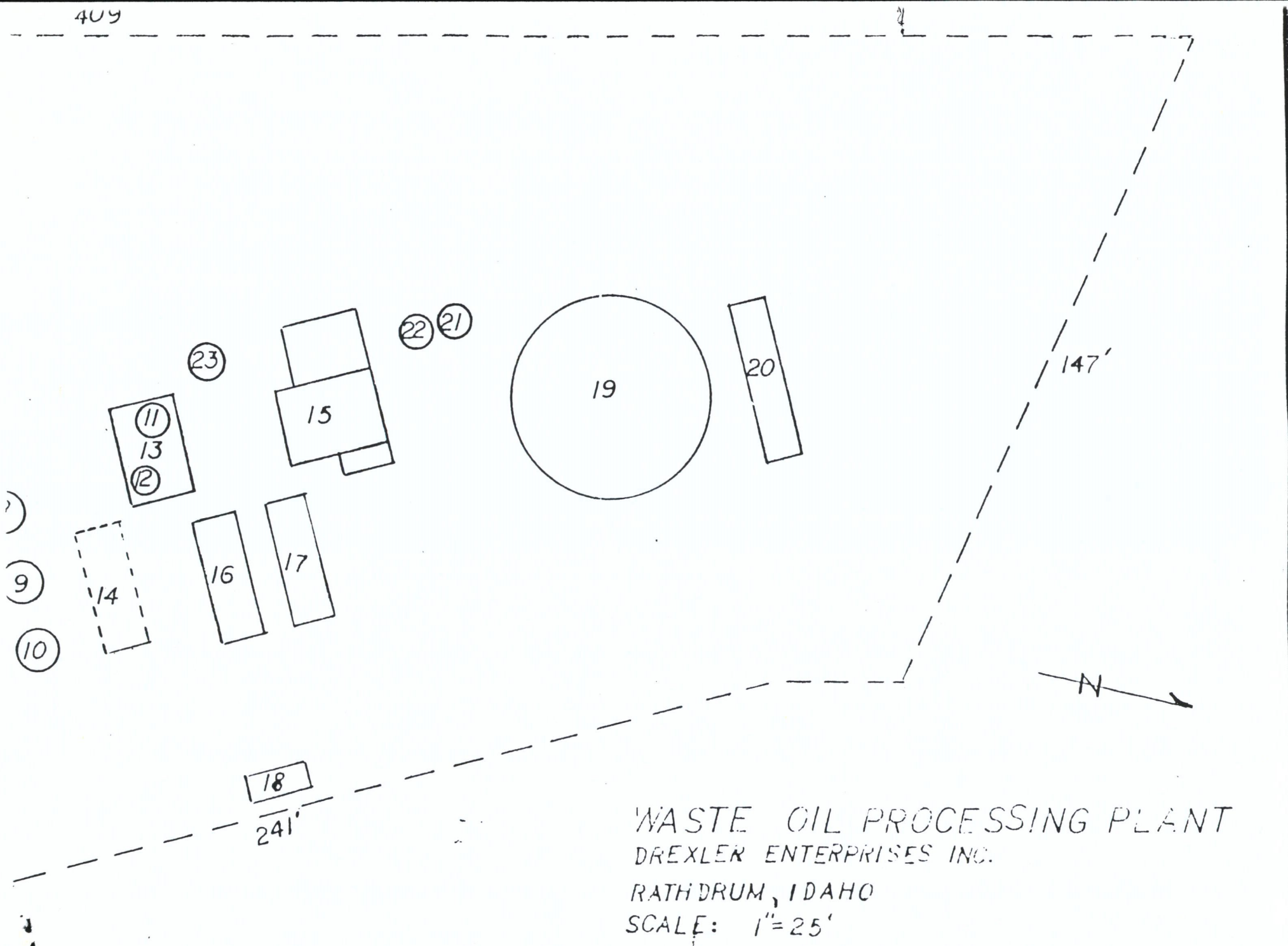
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

X. OPERATOR CERTIFICATION

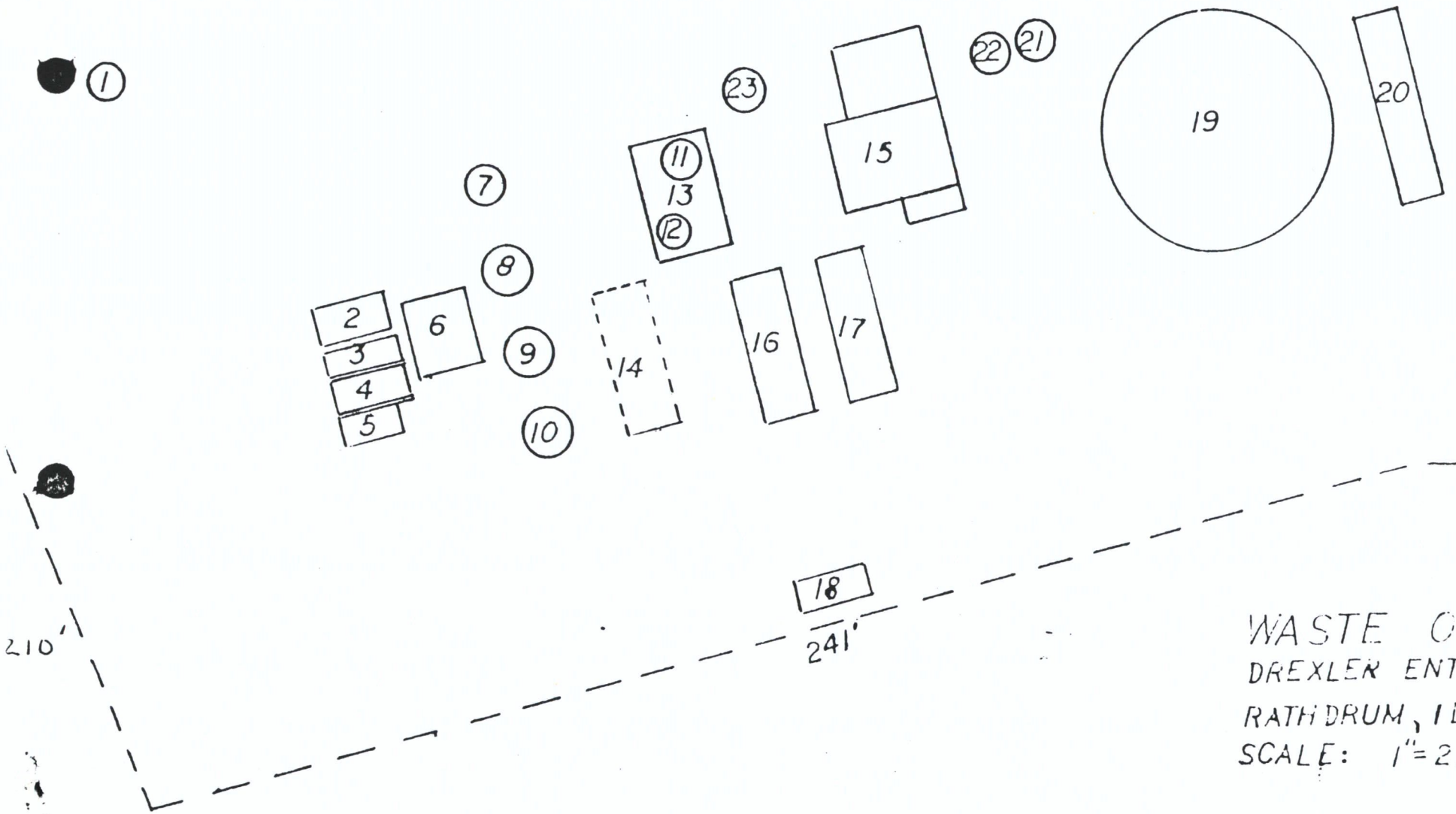
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

CONTINUE ON PAGE 5



WASTE OIL PROCESSING PLANT
DREXLER ENTERPRISES INC.
RATHDRUM, IDAHO
SCALE: 1"=25'



WASTE OIL P
DREXLER ENTERPRI
RATHDRUM, IDAHO
SCALE: 1"=25'

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F 1 D D 0 0 0 8 0 0 9 6 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
	80 11 19	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	80	01	01

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S02	67,000	G	
2	S03	10	Y	
3				
4				
5				
6				
7				
8				
9				
10				

CONTINUES FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
2992 (specify) OILS LUBRICATING; RE-REFINING	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: ~~DREXLER ENTERPRIZES INC~~ ARRCOM INC

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

R (specify)

D. PHONE *(area code & no.)*: A 509 624 7719

E. STREET OR P.O. BOX: PO BOX 125

F. CITY OR TOWN: BOTIS ORCHARDS

G. STATE: WA

H. ZIP CODE: 99027

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	D. PSD *(Air Emissions from Proposed Sources)*
9 N	9 P
B. UIC *(Underground Injection of Fluids)*	**E. OTHER** *(specify)*
9 U	9 (specify)
C. RCRA *(Hazardous Wastes)*	**E. OTHER** *(specify)*
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. B

XII. NATURE OF BUSINESS *(provide a brief description)*

To transport and re-process (dry and filter) used oil into a useable fuel product.

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett Secretary	W. A. Pickett - Secretary	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

EPA Form 3510-1 (6-80) REVERSE

Arrcom Oil Co., Inc.
701 Bozarth
P.O. Box 56
Woodland, Wa. 98674
(206) 225-9733

February 3, 1981

EPA Region X
M/S 530-A
1200 Sixth Avenue
Seattle, WA 98101

RE: EPA ID # IDD000800961

Attn: Linda Dawson

Dear Ms Dawson:

As we discussed in our phone conversation of 2-3-81, I am submitting this letter to respectively request that the Environmental Protection Agency exercise its discretion in issuing an Interim Status Compliance Letter ("ISCL"), Pursuant to Title 40 CFR part 122.

Drexler Enterprises Incorpporated operates a facility in Rathdrum, Idaho, EPA ID# IDD000800961. The Notification of Hazardous Waste Activity was filed late. However the ID # was issued and the November 19th Form 3 application was submitted on time. This facility picks up waste oil and treats it for reuse. As waste oil is not regulated at present and because the nature of this activity benefits the public interest we would request the Interim Status Compliance Letter.

DEI operates in consolidation with Arrcom, Inc., a Washington corporation located in Woodland, Washington. Its President is Wally Drexler, whose signature will appear below in this request. Arrcom, Inc. EPA I.D.# WAD087462503 is up to date on all applications. Both facilities are complying with all applicable substantive environmental standards.

Thank You.

EPA EXHIBIT
4 - IDAHO

to Vi. C- 2/11/81

Arrcom Oil Co., Inc.
701 Bozarth
P.O. Box 56
Woodland, Wa. 98674
(206) 225-9733

February 5, 1981

EPA Region X
M/S 530-A
1200 Sixth Ave.
Seattle, WA 98101

Attn: Linda Dawson

Drexler Rathdrum, Id

Dear Ms Dawson:

Enclosed is the ammended version of our Form 3 for the Arrcom facility. I will submit the same for DEI later as it will require a different signature. At that time I will also submit the request for the "ISCL".

Thank You.

Yours truly,

James Cleve Ivers
Purchasing Agent
Arrcom, Inc.

JCI/lw
(Encl.)

EPA EXHIBIT
5-IDAHO

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Linda Dawson

TITLE:

LOCATION & PHONE NO.:

DATE: 8/4/81

TIME: PM

CALL TO: Jim Cross

TITLE: Arcom Oil

LOCATION & PHONE NO.: Tacoma 537-0068

SUMMARY OF CALL:

re: Dresler Enterprises, Rathdrum, Idaho. Facility has not received IS as they notified late. However, since - Mar '80 facility has handled only waste oil, all waste oil is recycled - not contaminated w/ solvents

are submitting a revised Form 3 to add solvents & will also reset units on 1a 3d 5 ~~and~~

also discussed signature - secretary appears to meet requirement

I will be sending IS letter addressed to Wally Dresler in Woodland WA

EPA EXHIBIT 6 - IDAHO

Linda Dawson
(Signature)

EPA-X-1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 530

AUG 13 1981

Wally Drexler
Arrcom Oil Company, Incorporated
P.O. Box 56
Woodland, Washington 98674

Re: Facility #IDD000800961

Dear Mr. Drexler:

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility with the EPA Identification Number shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that Section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

Your Part A permit application lists tank storage of D001 (ignitable) wastes, to cover the storage of waste oil prior to recycling. Pursuant to Section 122.23(c)(1) of the permit standards, new hazardous wastes not previously identified in Part A of the permit application may be treated, stored, or disposed of at a facility if the owner or operator submits a revised Part A permit application prior to any handling of the new waste material. We have information indicating that this facility has received spent solvent. If the solvent is any of those identified as Hazardous Waste Nos. F001 through F005 (list enclosed), this must be included on your permit application and you should submit a revised application immediately.

Please call Linda Dawson at (206) 442-1260 if you have any questions.

CONCURRENCES

SYMBOL						
SURNAME	Sincerely, Tobias Hegdahl, Chief Program Development Section				bcc: Jim Malm, DOE	EPA EXHIBIT 7 - IDAHO
DATE	cc: Athena Lalikos, EPA				Dawson:LW:8/12/81	8A

EPA Form 1320-1 (12-70) Beryl Koch, IDHW OFFICIAL FILE COPY

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Al Pickett

TITLE: Dreyles Enterprises / Arcom

LOCATION & PHONE NO.: Rathdrum, Idaho

DATE: 12/3/81

TIME: AM

CALL TO: Fred Dawson

TITLE:

LOCATION & PHONE NO.: 206 - 667 - 7[illegible] Rathdrum
509 - 624 - 7719 Otis Orchards

SUMMARY OF CALL:

Re: my conversation w/ Wally Dreyles regarding the need to revise Part A - Pickett will be handling this; will also submit a permit application for Arcom in Tacoma Mako facility, takes waste oil + solvents; blends + re-sells. Oil + solvent goes through a shaker (vibrating screen) to take out particulates; may store particulate sludge in a waste pile (currently listed on Part A).

I will return the Part A (Rathdrum) for corrections, send him a list of the FCOI - FCOS solvents, a Blank Part A for Arcom - Tacoma, and check the Arcom - Woodland Part A to see if any changes are necessary

(Signature)

EPA EXHIBIT 8 - IDAHO

EPA Form 1

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Linda Dawson

TITLE:

LOCATION & PHONE NO.:

DATE: 12/3/81

TIME: AM

CALL TO: Willy Dresler

TITLE: Pres Arcon OI

LOCATION & PHONE NO.: contacted at Rathdrum, Id facility 208-687-1783

SUMMARY OF CALL:

Told him that we had been getting reports about the Rathdrum facility taking spent solvents - Explained to him that his Part A lists no F001-F005 solvents thus, can't legally handle these.. He will submit revised Part A...

I also asked about his Arcon facility in Tacoma: reports that they were handling haz waste there - he said that they do take waste oil & solvent at this facility. Explained to him that facility must have interim status to handle listed solvents - he needs to get permit application in right away.

also Golden Penn Oil - Seattle (Harbor Island) his Arcon owns this (Jerry Dresler); handles waste oil & solvents will submit permit application for this also

(Signature) LD

EPA EXHIBIT 9 - IDAHO

EPA Form 1

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

December 4, 1981

REPLY TO ATTN OF: 530-A

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Alan Pickett
Arrcom, Incorporated
P.O. Box 125
Otis Orchards, Washington 99027

Dear Mr. Pickett:

As discussed in our phone conversation of December 3, 1981, I am returning the Part A permit application for facility #IDD000800961 in Rathdrum, Idaho. The application must be revised to reflect the facility's name change, and to list those solvents which your facility handles which are not currently covered by the application. I have enclosed a list of those spent solvents specifically listed as Hazardous Waste Numbers F001 through F005. As you know, a facility with interim status can handle only those hazardous wastes which are listed on their Part A permit application.

In our phone conversation you stated that residues generated from running oil and solvent through a shaker may at times be stored in a waste pile. Page 1 of 5 of the application correctly lists process code S03 for the waste pile; however, you must estimate the annual quantities of residues generated and stored in a waste pile and list this information on Page 3 of 5. The Part A application for the Arrcom facility in Woodland, Washington was revised by Jim Ivers of your company in February to include Hazardous Waste Numbers F003 and F005. However, I am returning the application to you so that you also may add the waste pile information to Page 3 of 5 of this application.

I have enclosed a blank Part A application form and a Form 8700-12, Notification of Hazardous Waste Activity. These must be submitted for the Arrcom facility in Tacoma, if this facility is storing or will be handling any of the listed spent solvents of Part 261.31 (F001-F005).

The completed applications must be returned to EPA by no later than January 4, 1982. You may either amend the Rathdrum application to make the necessary changes or submit a new form. In either case, we require that the certification (Items IX and X) be re-signed and re-dated.

EPA EXHIBIT
10-IDAHO

Please call me at (206) 442-1260 if you have any questions in filling out these forms.

Sincerely,

Linda Dawson

Linda Dawson,
Hazardous Waste Branch

Enclosures

cc: Wally Drexler, President, Arrcom, Inc.
Tom Cook, WA Department of Ecology
Jim Oberlander, WA Department of Ecology
Lyman Nielson, Washington Operations Office, EPA
Daryl Koch, Idaho Department of Health and Welfare
Athena Lalikos, Idaho Operations Office, EPA

JAN 11 1982

530

CERTIFIED MAIL - RETURN RECEIPT _REQUESTED

Alan Pickett
Arcom ~~Ancom~~, Incorporated
P.O. Box 125
Otis Orchards, Washington 99027

Re: Hazardous Waste Permit Applications

Dear Mr. Pickett:

As we discussed, I am returning your forms for corrections. Specifically, the following must be added or revised:

Rathdrum Page 3 of 5, all units of measure and annual quantities must be converted to pounds (P) or tons (T);

Page 4 of 5, certification must be re-signed and re-dated;

Application needs a USGS topographic map of the area extending to at least one mile beyond property boundaries.

Tacoma Page 1 of 5, existing facility date;

Page 3 of 5, all units of measure and annual quantities must be converted to pounds (P) or tons(T);

Application needs a facility drawing, topographic map and photographs.~~p and photographs~~.

Page 4 of 5, entire page must be completed.

Woodland Page 3 of 5, units of measure and annual quantity on line 4 must be converted to pounds (P) or tons (T).

EPA EXHIBIT
11 - IDAHO

Thank you for your cooperation. Please call me at (206) 442-1260 if your have any further questions. These forms must be returned to EPA by January 22, 1982.

Sincerely,

Linda Dawson
Waste Management Branch

Enclosures

LDawson:nay 01-11-82

PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery.... ¢
- ☒ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Arrcom
Alan Pickett, ~~Ancom~~, Inc
P.O. Box 125
Otis Orchards, WA 99027

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 0310398 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
A. Pickett

4. DATE OF DELIVERY
POSTMARK JAN 15 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS
MC

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-288-848

No. 0310398

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Alan Pickett, ~~Ancom~~ Arrcom, Inc
STREET AND NO. P.O. Box 125
P.O. STATE AND ZIP CODE Otis Orchards, WA 99027

POSTAGE	$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$

CONSULT POSTMASTER FOR FEES — OPTIONAL SERVICES

POSTMARK OR DATE
Sent 1/11/82
For Woodland
Tacoma
Rathdrum

PS Form 3800, Apr. 1976

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Al Pickett
Arcom 208-687-1783

FROM: L. DAWSON

DATE 2/5/82

TIME AM

SUBJECT
whereabouts of his applications which were due back on 1/22/82

SUMMARY OF COMMUNICATION

2/5 no answer at 208-687-1783 Rathdrum, Id
509-624-7719 Otis Orchards, WA - number disconnected
206-225-9733 Arcom, Woodland, WA - number disconnected
206-272-7701 Arcom, Tacoma, WA - number disconnected

2/8 no answer at Rathdrum

2/8 509-484-8282 Otis Orchards Al Pickett asked him why they didn't meet Jan 22 deadline for resubmitting their applications - he said they are currently deciding whether they want to continue handling solvents at Woodland, Tacoma or Rathdrum. Woodland facility may close altogether.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

He agreed to respond by Feb 19 with letter explaining which facilities if any will want permits or revised applications will be submitted by then.

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 530

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 09 1982

Alan Pickett
Arrcom, Incorporated
P.O. Box 125
Otis Orchards, WA 99027

Dear Mr. Pickett:

As discussed with Linda Dawson on February 8, 1982, your company failed to respond to a January 22, 1982 deadline for resubmittal of the hazardous waste permit applications for the Rathdrum, Tacoma and Woodland facilities. You stated that you are currently reviewing the activities at these sites and determining whether you wish to continue to operate hazardous waste management facilities, and stated that the Woodland facility may close altogether. You agreed to advise EPA of your decision and/or resubmit the permit applications by no later than February 19, 1982.

Owners or operators of hazardous waste management facilities must submit a closure plan to the EPA at least 180 days before the date they expect to begin closure (40 CFR Part 265.112). This plan must include an inventory of the wastes in storage, a description of steps needed to decontaminate facility equipment, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. If you do plan to close any of your facilities within the next 180 days, you must submit your closure plan immediately.

The issue of your revising and/or re-submitting the Part A permit applications has been outstanding for some time. We feel we have provided ample guidance and time for your reassessment of each facility, correcting the forms, and re-submitting to EPA. I do want to provide this one additional opportunity for you to voluntarily submit the requested information; however, I would consider your failure to re-submit by the agreed date of February 19, 1982 as a basis for referral to our enforcement program for appropriate action.

LDawson:nay 02-09-82

CONCURRENCES								
SYMBOL	L.Dawson	K.Feigner						
SURNAME								
DATE								

EPA EXHIBIT 13-IDAHO

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

Please call me at (206) 442-1253 if you have any questions.

Sincerely,

Kenneth D. Feigner, Chief
Waste Management Branch

cc: Wally Drexler, President, Arrcom Inc.
Tom Cook, Washington Department of Ecology
Jim Oberlander, Washington Department of Ecology
Daryl Koch, Idaho Department of Health & Welfare
Steve Provant, Idaho Operations Office, EPA
Jim Dunn, Montana Operations Office, EPA
Don Donaldson, EPA Enforcement

PS Form 3811, Jun. 1979

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☐ Show to whom, date and address of delivery... ¢
- ☒ RESTRICTED DELIVERY
- ☐ Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
- ☐ Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Alan Pickett
Arrcom, Inc.
P.O. Box 125 Otis Orchards, WA 99027

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0310391	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
A. Pickett

4. DATE OF DELIVERY — POSTMARK
FEB 18 OTIS ORCHARDS WASH

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

No. 0310391

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO: Alan Pickett
STREET AND NO.: PO Box 125
P.O. STATE AND ZIP CODE: Otis Orchards Wa 99027

POSTAGE		$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢
OPTIONAL SERVICES	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
	RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED	¢
	RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$

POSTMARK OR DATE

PS Form 3800, Apr. 1976

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)	
TO: DAVID DREXLER ARRCOM TACOMA 206-673-5347	FROM: L. DAWSON	DATE 3/4/82 TIME AM

SUBJECT: Letter to RA regarding Rathdrum Closure / TACOMA Part A

SUMMARY OF COMMUNICATION

D. Drexler out; given another Tacoma # to leave message: 206-752-8986 Told that Wally Drexler can also be reached here. Left message w/ D. Drexler that it is urgent that he call me . . .

3/5/82 206-752-8986 (# is to their accountants)
Left message for W. + D. Drexler "extremely important that they call me . . ."

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Al Pickett
Arrcom
509-484-8282

FROM: L. DAWSON

DATE 3/5/82

TIME AM

SUBJECT
letter they were to send us regarding Rathdrum + Woodland

SUMMARY OF COMMUNICATION CLOSURE; Part A (revised) for Tacoma

Rathdrum + Woodland facilities still closed; still possible that they will re-lease Rathdrum. No desire to release Woodland.

W. Bingham also owns Woodland facility...

Heard that Chempro may look at Woodland for lease..

Pickett doesn't think they handled solvent at Woodland, just waste oil

Discussed fact that they didn't follow closure procedures for Rathdrum; won't matter if they re-lease it.

Tacoma facility does still want to pursue a storage permit. He's been trying to get D. Drexler to get letter and Tacoma Part A in.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

° RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☒ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Betty W.; Glen R.; & file

FROM: Mike Brown, Waste Management Br.

DATE: 6-9-82 & 6-22-82

TIME: 9:30 → 11:00 AM

SUBJECT: Amcom → Dreyer family

SUMMARY OF COMMUNICATION

Will Abercrombie (WDOE - SW) and myself inspected the Amcom facility located in Tacoma (WAD 98-066-4718) on 6-9-82. The following information was obtained

- Dreyer Family = Wally (father) (= Sarge) Hazel (mother)
  Terry, Dave, Tom } sons

- Past & present names of the facilities
  Dreyer Enterprises Inc. (= DEI)
  (dba?) Amcom Inc
  Terry Dreyer Inc. (= TDI)
  dba ~~Golden Penn Oil~~ → No HW
  dba Western Pacific Vacuum Service

other companies
TAD = Tommy & David
WH = Wally & Hazel

- Geographical Location

Place	EPA ID	Co. Name
Rathdrum, Id.	IDD 00-800-9961	Amcom, DEI
Woodland, WA	WAD 05-746-2503	Amcom, DEI
Tacoma, WA	WAD 98-066-4718	Amcom, DEI, TDI
Seattle, WA	WAD 00-064-3593	TDI, Western Pacific Vacuum

~~CONCLUSIONS, ACTION TAKEN OR REQUIRED~~

- Responsible parties
  Rathdrum, Id → Wally (operator); Warren Bingham (owner)
  Woodland, WA → Wally ("); Warren Bingham (owner)
  * Tacoma, WA → Terry ("); ? (")
  Seattle, WA → Terry ("); ? (")

* Tacoma facility is subleasing from Amcom (Neg)

EPA Exhibit 16 - Idaho

INFORMATION COPIES
TO: Vince, Mike Bussell, Glen R

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

- Relevant addresses & Phone #
  - Tommy Dreier lives in Idaho, Rathdrum
  - Terry Dreier
    Western Pacific Vacuum Service
  - Wally Dreier
    (b) (6)
  - Warren Bingham
    (b) (6)
    addresses
- Operat
  - Rathdrum ID - closed; Wally locked out
  - Woodland, WA - closed; Wally locked out; No HW even on site?
  - Tacoma, WA - DEI → TEI
  - Seattle, WA - TEI
- Compliance Status
  - Rathdrum, ID → closure needed
  - Woodland, WA → closure probably needed; question if there was ever on site
  - Tacoma, WA → change of ownership, (resubmit Part A & waive financial)
  - Seattle, WA → no known violation issued from Tacoma meeting
- Further Action
  - on site inspection Rathdrum & Woodland & Responsible party needed
  - compliance letter needed for change of ownership for Tacoma

Idaho — Herbert Nagel
111 North Second St.
Coeur D' Alene ID 83814
667-9597

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: File

FROM: Mike Brown
RCRA Compliance

DATE 6-22-82

TIME 2:00 → 3:30

SUBJECT Responsibility for Rothdrum & Woodland

SUMMARY OF COMMUNICATION

Conference: Mike Brown Warren Bingham
Jerge Hefer

overview: general introductions → background of RCRA law → EPA view of O/O responsibility → history of Woodland & Rothdrum sites → Financial requirements (Consultants)

Info from Warren Bingham

- Warren Bingham (WB) is a retired Industrial Engineer from the UPS.
- Bought four pieces of property from Wally Drexler in Jan 1980. Two of these properties were homes and two (Woodland & Rothdrum) were waste recycling sites.
- The sales Drexler → Bingham were a sale back back arrangements Wally Drexler had agreed to lease for two years Jan 80 → Jan 82.
- Wally Drexler had a series heart attack Dec 79 (unknown to WB until after signing. Wally was unable to work for 1 yr.
- David Drexler took over in his absence
- The First 14 payments were made but they ~~became~~ were received later, and later in the month. All payments stopped in Nov 81
- WB brought suit in Nov 81. WB gave Wally three month extensions because of his failure to perform.
- WB finally locked Wally out of both sites
- Presently, we (EPA & State) are scheduling an inspection ~~with~~ at both site to determine if HW is present at this time.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES TO:

- Wally Drexler took all records from the site as well as some equipment when he was locked out.

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

History of Wally Dreier

- originally from midwest
- injured in war & has use of one eye
- claimed Bankruptcy a few years ago
- worked as a chemist for a local oil refinery
- closed down by Puegent Sound Pollution Control Agency in the mid 1970's (Superior Oil Service - Woodinville)
- Weyerhaeuser has brought suit against Wally Dreier recently
- Grand Jury has investigated Wally last year.
- home was broadlawn presently for sale
- Wally bought the Rothchild site from Alan Pickett who was hired by Wally to run the facility.
- Mr. Foss in Tacoma is Wally's attorney.
- WB considers Wally to be a talented person who overextended his capital resources

EPA received 7-8-82 WSB

July 1, 1982

Mr. George Hofer
Environmental Protection Agency
1200 6th Ave - Mail Stop #S-33
Seattle, Washington 98101

Dear George,

This letter is sent to inform you that I am meeting with Mike Brown and representatives of the Washington Dept of Ecology at my Woodland, Wash. Waste Oil Plant on 7/9/82 at 9:30 A.M. and at the Kathdrum, Idaho plant on 7/20/82 at 9:30 A.M.

These meetings are followups to our meeting a week and a half ago in your Seattle office.

This will be my first involvement with on site inspection and it will be beneficial to my understanding of the problems.

I am anxious to comply with regulations and if there is a presence of hazardous waste materials on these premises the proper action can be determined.

Best Regards,
Warren W. Bingham

WARREN W. BINGHAM
P.O. Box 93
WOODLAND, WASH. 98674

WOODLAND, WA
JUL 6
1982

USA 20c

RECEIVED
JUL 8 1982
TECHNICAL OPERATIONS SECTION

MR GEORGE HOFER
C/o E.P.A. - MAIL STOP #533
1200 6th AVE
SEATTLE, WASH. 98101

TRIP REPORT MIKE BROWN, AIR AND WASTE MGMT. DIV.

Date: 7-20-82 Time: 9:30 to 11:00 site Babin's Office: 11:45 to 1:00

Place: Arrcom; Rathdrum, Idaho. IDD 00-080-0961

People: Mike Brown: EPA - A & WMD
Athena Lalikos; EPA - IOO
Ken Babin; Idaho Dept. of Health
Warren Bingham; Owner

Purpose: RCRA ISS Inspection (Brown and Babin)
PCB Inspection (Athena)

Map: Attached Pictures: File 12 pictures
Samples: Taken

Notes:

Site: Rathdrum

- First RCRA inspection. Ken Babin had filled out an inspection report previously but the inspection was not too useful because it was carried out via telephone call and did not contain quality/quantity of information.

- Sites was disorganized and cluttered
  - Tanks were turned on their sides
  - Containers were stored here and there with some turned over leaking a tarry liquid leaking out.

- Ponding of oily water was seen around central processing area (Building 15 & 13).

- Roadway going around tanks and processing area had been soaked with oil for a long period of time.

- Most of the processing equipment was caked with oil and crude.

- Site according to Ken Babin was over the Spokane sole-source aquifer. Water table approximately 150 feet deep.

- No records or manifest were seen on site in the buildings.

EPA EXHIBIT
19 - IDAHO

- Samples were taken by Athena
  Taken for PCBs Analysis — 2900 — 225479 oil/water, 80 oil/water, 81 oil/water, 82 soil, 83 oil/water — Pool Samples and run Priority Pollutant (PP) Scan

- Tank # 16 & # 17 were found to be approximately 1/3 full of a sludge looking material.

- Tank # 19 was reported by Ken and Athena to be leaking approximately 1 ft off ground through seams.

- Tank trucks in various stages of disrepair were parked in the brush around the site.

- State or IOO was not aware of any SPCC plans for the site.

Office to Coeur d'Alene

- Followed Ken Babin to his office. Warren Bingham was put on notice ot a possible NOV letter.

- Discussed Applicable Laws
  (a) RCRA
  (b) TSCA - PCB
  (c) SDWA - Sole Source
  (d) CWA - SPCC Plan
  (e) Idaho Water Quality Law

BAD O

- RCRA Violations - Company appears to have Interim Status although Alan Pickett signed for Warren Bingham as owner without Bingham's permission or knowledge.

B. General Facilities Standards

265.12	Notification of change of operators
265.14	Security
265.15	General Inspection requirement
265.16	Personnel Training

C. Preparedness and Prevention

265.31	Equipment internal communication system, fire extinguishers, etc.
265.37	Arrangements with local authorities

D. Contingency Plan and Emergency Procedures

265.51	Contingency plan
265.55	Emergency coordinator
265.56	Emergency procedure

E. Manifest System, Record Keeping, and Reporting

265.71	Use of manifest system
265.73	Operating record
265.74	Availability, retention and disposition of records

Subpart G Closure and Post Closure

265.111	Closure performance standard

Subpart H Financial

265.142	Cost estimates for facility closure
265.143	Financial assurance for facility closure
265.147	Liability requirements

Subpart I Use and Management of Containers

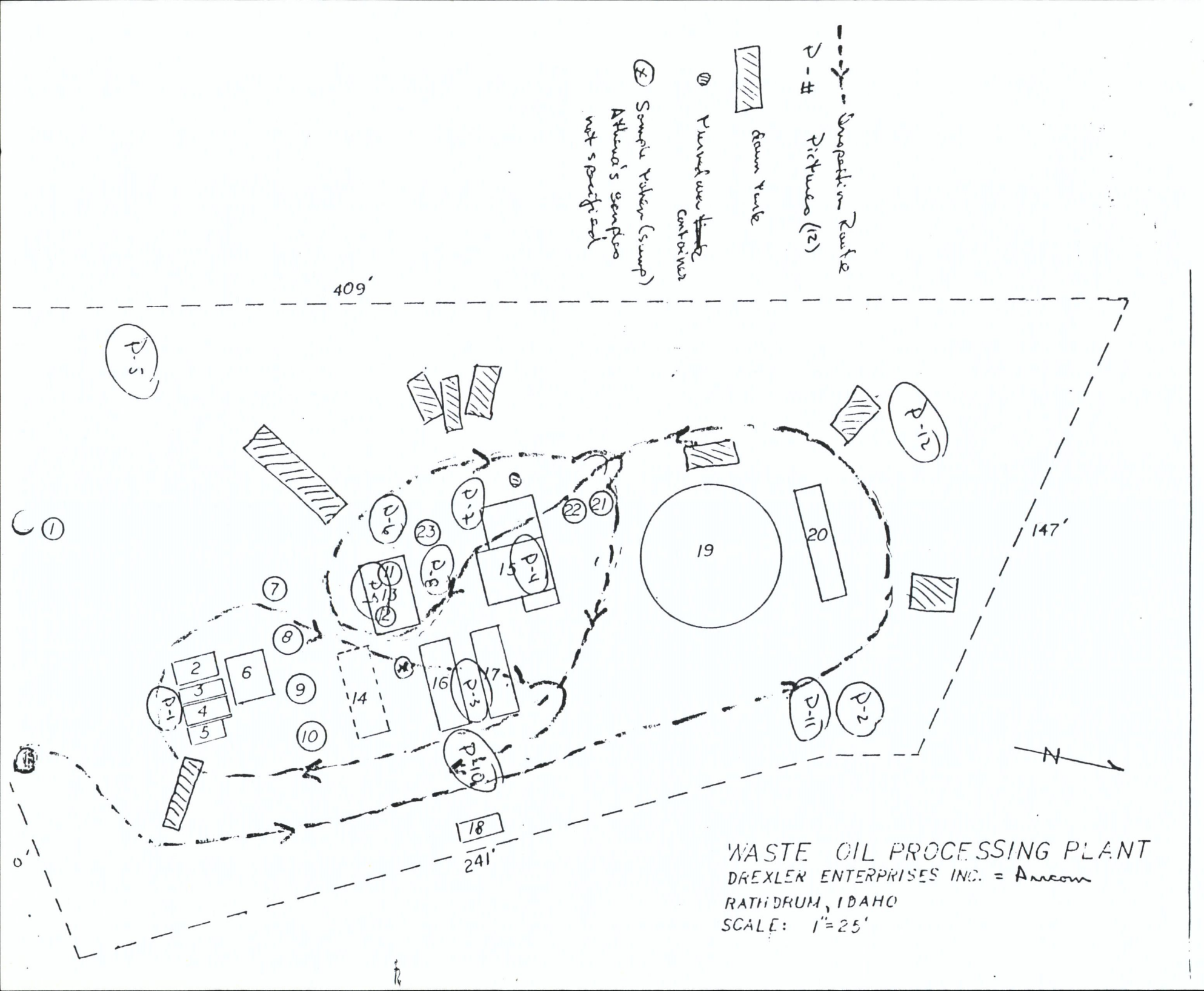
265.173	Management of containers

Subpart J Tanks

265.194	Inspections
265.197	Closure

IDD 00-080-0961

1. Water well
2. T-48 2,000 Gal. Re-refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T-28 1,200 Gal. Electric heater tank
12. 48" shaker
13. Shaker building
14. T-144 6,000 Gal. Underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage



TDD 00-080-9961

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Ancon, Inc. EPA I.D. Number: IDD 00-080-0961

COMPANY ADDRESS: 5 ME State Line HWY 53, Rathdrum, ID.

COMPANY CONTACT OR OFFICIAL: Warren Bingham

TITLE: Owner

OTHER ENVIRONMENTAL PERMITS HELD

BY FACILITY: ___ NPDES

___ AIR

___ OTHER

Ken Babin
Athena Lalikos
Warren Bingham

INSPECTOR'S NAME: Mike Brown DATE OF INSPECTION: 7-20-92

BRANCH/ORGANIZATION: EPA TIME OF DAY INSPECTION TOOK PLACE: AM

1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

___ Company admits that its waste is hazardous during the inspection.

___ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

___ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

___ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

___ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

X EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

Samples taken from HW pond
1,1 Trichlorethane
ethyl benzene
Methyl chloride
Toluene

___ Company is unsure but here is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	X	___	___

Please explain: 13 manifests

c. Identify the hazardous wastes by hazardous waste code that are on-site, and estimate approximate quantities of each.

2) Does the facility generate hazardous waste?	___	X	___
3) Does the facility transport hazardous waste?	X	___	___
4) Does the facility treat, store or dispose of hazardous waste?	X	___	___

waste oil recycling operation

EPA Exhibit 20-
Idaho

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW	
(5) SITE SECURITY (§265.14)				
a. Is there a 24-hour surveillance system?	—	X	—	Fence around the area but no gate
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	X	—	—	
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	—	X	—	
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	X	—	—	
a. If "YES", what are the approximate quantities?				
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	—	X	—	Lab analysis revealed that NCW was leaking into the ground
c. If "YES", explain → NCW				
d. In your opinion, are proper precautions taken so that these wastes do not:				
- generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	—	
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	—	—	—	
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	—	—	—	
- damage the structural integrity of the device or facility containing the waste?	—	—	—	
- threaten human health or the environment?	—	—	—	

Please explain your answers, and comment if necessary. clean up is needed

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32) No No equipment

	YES	NO	DON'T KNOW
- an internal communications or alarm system?		X	
- a telephone or other device to summon emergency assistance from local authorities?		X	
- portable fire equipment?		X	
- adequate aisle space?		X	
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.		X	

← telephone out of order

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?		N/A	
- If you have, please comment, as appropriate.			
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.			
b. Do you believe that operation of this facility may affect groundwater quality?			
c. If "YES", explain.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		X	
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?			
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)			
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number			

→ Records & all manifests impounded by FBI for Grand Jury Investigation

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number			
- the name, and EPA identification number of each transporter			
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;			
- a DOT description of the wastes			
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle			
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.			
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)		X	
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same ____ Company treats all waste as hazardous ____ Don't Know ____			
b. Does hazardous waste come to this facility from off-site sources?	X		
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?		X	
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?		X	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?			
c. Does the owner/operator record inspections in a log?			
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.			

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. Is there written documentation of the following:			
- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?			
- type and amount of training to be given to personnel in jobs related to hazardous waste management?			
- actual training or experience received by personnel?			
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)		X	
a. Does the plan describe arrangements made with local authorities?			
b. Has the contingency plan been submitted to local authorities?			
How do you know?			
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?			
d. Does the plan have a list of what emergency equipment is available?			
e. Is there a provision for evacuating facility personnel?			
f. Was an Emergency Coordinator present or on call at the time of the inspection?			
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?		X	
- location and quantity of each waste?			
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?			
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?			
*(16) Does the facility have written closure and post-closure plans? (§265.110)			
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?			

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	___	X	___
- a description of the steps necessary to decontaminate facility equipment during closure?	___	___	___
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	___	___	___
b. What is the anticipated date for final closure?	___	___	___
c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?	___	___	___
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?	___	N/A	___
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	___	___	___
17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?	___	X	___
18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)	___	N/A	___
19) Has a groundwater monitoring program been implemented?	___	N/A	___
a. If "yes," has the facility installed 1 upgradient and 3 downgradient monitoring wells?	___	___	___
b. Is there a groundwater sampling and analysis available at the facility?			
c. Does the water sampling and analysis plan include procedures and techniques for:			
- Sample collection	___	___	___
- Sample preservation and shipment	___	___	___
- Analytical procedures	___	___	___
- Chain of custody procedures	___	___	___

	YES	NO	DON'T KNOW
d. Has the facility opted to maintain an alternate groundwater monitoring system?		N/A	
e. If answer is "yes" to "d" above, have they submitted the alternate groundwater monitoring plan to the Regional Administrator per 265.90(d)?			
f. Has the alternate groundwater monitoring plan been certified by a qualified geologist or geotechnical engineer?			
g. Is the facility waiving the groundwater monitoring requirements per §265.90(c)?			
h. If answer is "yes" to "g" above, does the written demonstration appear to meet the requirements of §265.90(c)?			

Pictures were taken

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

✓ STORAGE	✓ TREATMENT	DISPOSAL
Waste Pile p.9	Tank p.8	Landfill pp.10-11
Surface Impoundment p. 8	Surface impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p.7	Incineration pp. 12-13	Surface Impoundment p.8
Tank, above ground p.8	Thermal Treatment pp. 12-13	Other_____
Tank, below ground p.8	Land Treatment pp. 9-10	
a. can be entered for inspection ___		
b. cannot be entered for inspection ___		
Other_____	Chemical, Physical and Biological Treatment (other than in tanks, surface impoundment of land treatment facilities) p. 13	
	Other _____	

CONTAINERS (§265.170)	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES," explain.	X	X	
2. Are there any containers which appear in danger of leaking? If "YES," explain.	X		
3. Do wastes appear compatible with container materials?	✓		
4. Are all containers closed except those in use?		X	
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		X	
6. How often does the plant manager claim to inspect container storage areas? _____			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES," explain.			X
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	✓		
9. What is the approximate number and size of containers with hazardous wastes?			X

→ Some containers were overturned & a black sludge like material was leaking out. It is unknown whether the leaking containers had been.

← containers were in bad disrepair & haphazardly placed around the waste management facility.

TANKS (§265.190)

	YES	NO	DON'T KNOW	
1. Are there any leaking tanks? If "YES", explain.	X			45,000 gal ~~Future~~ Tank was found to be leaking. It is not known what liquid
2. Are there any tanks which appear in danger of leaking. If "YES", explain.	X			
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.			X	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	X			
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?			X	
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.			X	
7. How often does the plant manager claim to inspect container storage areas?		(X)		→ Plant is not presently in operation
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.		X		
9. What is the approximate number and size of tanks containing hazardous wastes?			(X)	Owner did not have a good idea about what was present

SURFACE IMPOUNDMENTS (§265.220)

	YES	NO	DON'T KNOW
1. Is there at least 2 feet of freeboard in the impoundment?		N/A	
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.		N/A	
5. Are there any leaks, failures or is there any deterioration in the impoundments? If "YES", explain.			
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

	YES	NO	DON'T KNOW
1. Is the waste pile protected from wind erosion?		N/A	
a. Does it appear to need such protection?			
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.			
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.			
a. Is the pile placed on an impermeable base that is compatible with the waste?			
b. Is the pile protected from precipitation and run-on?			
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.			
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.			
5. How many waste piles are on site, and approximately how large are they?			

LAND TREATMENT (§265.270)

	YES	NO	DON'T KNOW
1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil? Please explain.		N/A	

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?		N/A	
*3. Is run-off collected?			
4. Are food chain crops being grown on the facility property?			
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or			
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.			
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?			
5. Is there a written and implemented plan for unsaturated zone monitoring?			
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?			
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?			
b. control of run-off, release of airborne particulate contaminants?			
c. compliance with requirements for the growth of food-chain crops (if they are present)?			
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.			
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.			
10. What is the area of the land receiving hazardous waste treatment?			
LANDFILLS (§265.300)			
†1. Is run-on diverted away from the active portions of the landfill?		N/A	
†2. Is run-off from active portions of the landfill collected?			

* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

	YES	NO	DON'T KNOW
3. Is waste which is subject to wind dispersal controlled? Explain.		N/A	
4. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell			
- the contents of each cell and approximate location of each hazardous waste type			
5. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?			
- control of surface water infiltration?			
- prevention of erosion?			
6. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.			
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.			
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",			
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?			
b. Is the waste treated and stabilized so that free liquids are no longer present?			
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?			
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?			
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?			
11. What is the approximate area of the hazardous waste landfill?			

* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.			
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste			
- halogen content			
- sulfur content			
- concentration of lead			
- concentration of mercury			
NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].			
4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?			
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed			
- auxiliary fuel feed			
- air flow			
- incinerator temperature			
- scrubber flow			
- scrubber pH			
- relevant level controls			
Every hour for:			
- stack plume (color and opacity)			
5. Is there open burning of hazardous waste?			

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.		N/A	
a. Is there any evidence of fugitive emissions?			
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.			
8. What types of air pollution control devices (if any) are installed on the incinerator?			

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT ($265.400)

	YES	NO	DON'T KNOW
1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.			
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?			
3. Is there ignitable or reactive waste fed into the treatment system?			
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.			
Are the incompatible wastes placed in the same treatment process? If "YES", explain.			

5. Describe the treatment system at this facility.

COLLECTION RE[illegible] | TSCA/SWA | 225 [illegible]

3. DATE COLLECT	4. PROJ CODE	5. [illegible]TION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISH[illegible] NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Firm's Name and Address, etc.)

(POOLING OF PETROLEUM MIXTURE) Within containment housing 'finished oil storage holding tank. (See photo)

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. [illegible]
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO [illegible]

a. [illegible]	b. [illegible]	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Idt sample "225479 07-20-82 AKL" Polybagged, Sealed with EPA seal idt "225479 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225480, 81, 82, 225483.

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/SWA

22. NOTICE OF INSPECTION ISSUED	X	23. RECEIPT FOR SAMPLES ISSUED	X

24. REMARKS Presented credentials to owner of property Mr. Warren Bingham. N/I was not signed by Bingham who felt he needed legal advice on this matter. Polaroid attd of sampling point.

Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs — to undergo a priority pollutant scan. (See Mike Fromm, Seattle, m2052)

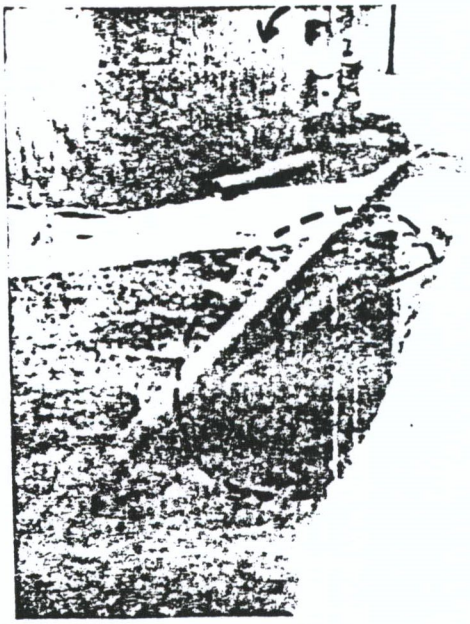
Schematic with legend attd of site.
Chain of Custody enclosed within sample package.

25. $ -	C	V	P	26. COLLECTION STA[illegible]	27. COLLECTOR'S NAME (Print) AND SIGNATURE
	☐	☐	☐	Boise	Athena K. Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE

EPA EXHIBIT
21-IDAHO

HOLDING TANK



225479 07·20·82 AKL

ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PRO[illegible] AGENCY
COLLECTION REPORT

1. TYPE SAMPLE	2. SAMPLE #
TSCA/CWA	225481

3. DATE COLLECT	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. CA TE(S) SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (*Name, Brand, Q.C. Statement, Active Ingredients, Firm Name and Address, etc.*)

(POOLING OF PETROLEUM MIXTURE) In general area of oil storage holding tank. (See photo)
Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. [illegible] AND SAMPLE SENT TO (*Specify location*)

a. ORIGINAL RECORDS	b. PRODUCING REGION COPY	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347055 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Idt sample "225481 07-20-82 AHL" Polybagged, sealed with EPA seal idt "225481 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 80, 82, 225483

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/TSCA

22. NOTICE OF INSPECTION ISSUED	X	23. RECEIPT FOR SAMPLES ISSUED	X

24. REMARKS
Displayed credentials to owner of property Mr. Warren Tingham. N/C was not signed by Tingham who felt he needed legal advice on disposition. Polaroid attd of sampling point.

Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs -- to undergo a priority pollutant scan (see Mike Bromm, Seattle, x2852)

Schematic with legend attd of site.

Chain of Custody enclosed within sample package.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Typed) AND SIGNATURE
S -	☐	☐	☐	Boise	ATHENA K LALIKOS Athena K Lalikos

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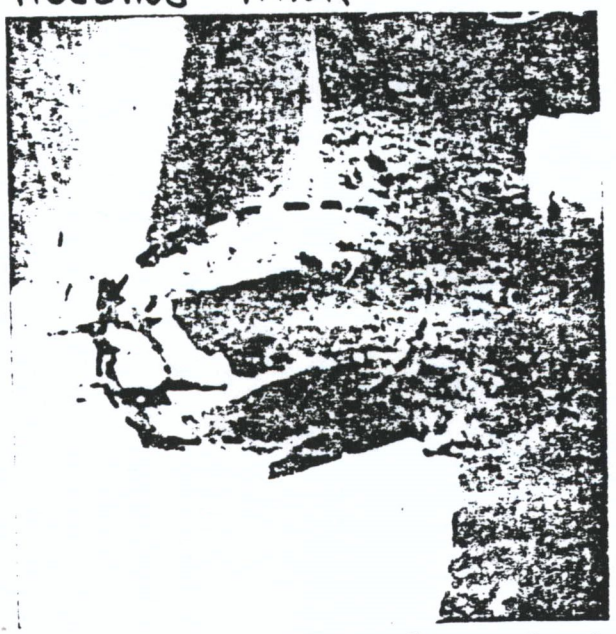
HOLDING TANK



225481 07-20-82 AKL

ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PROT AGENCY COLLECTION R JRT				TYPE SAMPLE TSCA/CMA	SAMPLE 225-80
3. DATE COLLECT 07-30-82	4. PROJ CODE -	5. REGION NO. 10	6. INSP NO. 011	7. REGISTRATION NO. -	8. ESTABLISHMENT NO. -
9. DATE SHIPPED N/A		10. FLAG Possibly PCB contaminated/Hazardous Waste			

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Trade Name and Address, etc.)

(POOLING OF PETROLEUM MIXTURE) South side of building housing 'shaker' and spigot.
(See photo)
Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Name of Laboratory or Person)

a. ORIGINAL RECORDS	b. PHOTOCOPY OF RECORDS	c. SAMPLE
Seattle	Boise	Manchester
d. SAMPLE DELIVERED TO	e. DATE	f. AIR NO.
Manchester Labvia Garrett Freightlines	07-30-82	240-3479.3 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Idt sample"225480 07-30-82 ATL" Polybagged, Sealed with EPA seal idt "225480 07-30-82 ATHENA K. LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 81, 82, 225483.

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CMA.

22. NOTICE OF INSPECTION ISSUED		23. RECEIPT FOR SAMPLES ISSUED	X

24. REMARKS
Displayed credentials to owner of property Mr. Warren Bingham.
W/C was not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.

Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs — to undergo a priority pollutant scan. (See Mike Brown, Seattle, x2652)
Schematic with legend attd of site.
Chain of Custody enclosed within sample package.

25. S-	C ☐	N ☐	B ☐	26. COLLECTION STA Boise	27. COLLECTOR'S NAME (Print) AND SIGNATURE ATHENA K LALIKOS Athena K Lalikos

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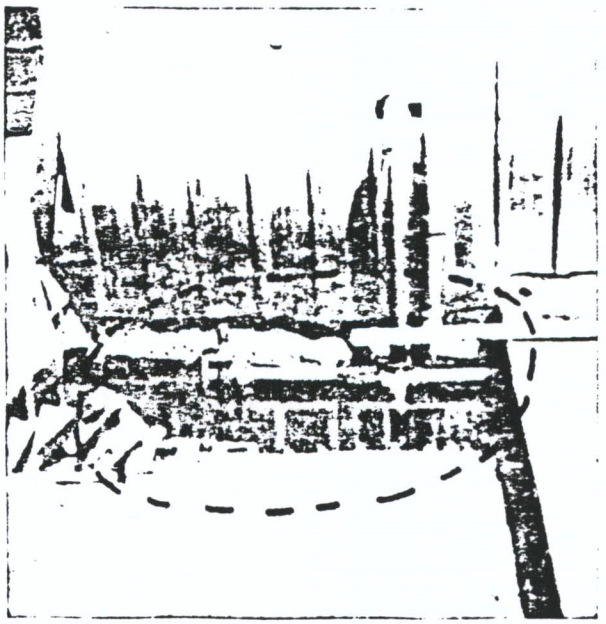

225480 07-20-82 AKL
BLDG HOUSING 'SHAKER'
ARRCOM / DREXLER
RATH DRUM, IDAHO

ENVIRONMENTAL PROT AGENCY
COLLECTION RE. ORT

1. TYPE SAMPLE	2. SAMPLE #
TSCA/CWA	225482

3. DATE COLLECT	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(SOIL UNDER TRUCK LOADING RACK) 1/1 glass pint soil
(See photo)

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Records location)

a. ORIGINAL RECORDS	b. PRODUCING ESTABLISHMENT COPY	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
Not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Scooped contaminated soil into 1/1 pint glass open mouth jar using jar as a digging device.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Idt jar "225482 07-20-82 AHL" Polybagged, Sealed with EPA seal idt "225482 07-20-82 ATHENA K. Lalikos"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 80, 81, 225483.

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA

22. NOTICE OF INSPECTION ISSUED	23. RECEIPT FOR SAMPLES ISSUED
X	X

24. REMARKS
Presented credentials to owner of property Mr. Warren Bingham.
W/C not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.

Schematic with legend attd of site.
Chain of Custody enclosed within sample packa e.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Typed) AND SIGNATURE
5	☐	☐	☐	Boise	ATHENA K. LALIKOS Athena K. Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE.

SAMPLE RECORD COPY

225482 07-20-82 AKL

UNDER LOADING PLATFORM
ARRCOM/DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PRO[illegible] AGENCY
COLLECTION REPORT

1. TYPE SAMPLE	2. SAMPLE
TSCA/CWA	225483

3. DATE COLLECTED	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(SUMP) 1/1 pint oil

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Specify Location)

a. ORIGINAL RECORDS	b. PRODUCING REGION COPY	c. SAMPLE
Seattle	Boise	Manchester
d. SAMPLE DELIVERED TO:	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
Not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Mike Brown reached down and retrieved sample in a 1/1 pint sample glass jar.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Sample idt "225483 07-20-82 MB" Polybagged, Sealed with EPA seal idt "225483 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 80, 81, 225482.

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA

22. NOTICE OF INSPECTION ISSUED		23. RECEIPT FOR SAMPLES ISSUED	X

24. REMARKS
Displayed credentials to owner of property Mr. Warren Bingham.
W/C not signed by Bingham who felt he needed legal advice on disposition.

Schematic with legend attd of site.
Chain of Custody enclosed within sample package.
Sample to be analyzed under the CWA/Priority Pollutant Scan, - first, then if need be under TSCA.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Type) AND SIGNATURE
S -	☐	☐	☐	Boise	ATHENA K LALIKOS Athena K. Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE.

SAMPLE RECEIVED COPY

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 5-26-82

ACID / BN FRACTION SAMPLE # :	composite of 29000 29001 and 29002					29004		
CAS # NAME	4/114					3/113		
1. 100-41-4 Ethylbenzene	+					+		
2. 108-38-3 meta Xylene	+					+		
3. 696-29-7 (1-methylethyl)-cyclohexane	+					—		
4. 1795-16-0 decyl-cyclohexane	+					+		
5.								
6.								
7.								
8.								
9. RIC shows evidence of Lub oil in sample	+					+		
10.								

EPA EXHIBIT
22-IDAHO

ACID COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: AB DATE: 8-27-82

SAMPLE # :	composite 29000, 29001 and 29002				29004		
UNITS :	ug/l				ug/Kg		
LOQ :							
1. 2,4,6-trichlorophenol	6000u				26000u		
2. p-chloro-m-cresol	2000u				11000u		
3. 2-chlorophenol	880u				3800u		
4. 2,4-dichlorophenol	2400u				11000u		
5. 2,4-dimethyl phenol	4500u				20000u		
6. 2-nitrophenol	7500u				33000u		
7. 4-nitrophenol	48000u				210000u		
8. 2,4-dinitrophenol	57000u				250000u		
9. 4,6-dinitro-o-cresol	19000u				84000u		
10. pentachlorophenol	57000u				250000u		
11. phenol	880u				3400u		

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

	SAMPLE # :	composite 29000, 29001 and 29002				29004	
	UNITS :	ug/L				ug/Kg	
	LOQ :						
39.	acenaphthylene	400 u				1800 u	
40.	anthracene / phenanthrene	14000				37000	
41.	benzo(ghi)perylene	4400 u				19000 u	
42.	fluorene	880 u				3900 u	
43.	~~phenanthrene~~	—				—	
44.	dibenzo(a,h)anthracene	80000 u				350000 u	
45.	ideno(1,2,3-cd)pyrene	70000 u				310000 u	
46.	pyrene	880 u				3900 u	
47.	TCDD	ND				ND	

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J N Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composite of 29008, 29001 and 29002				29004
UNITS :	ug/L				ug/Kg
LOQ :					
17. 4-bromophenyl phenyl ether	3080u				14000u
18. bis(2-chloroisopropyl) ether	440u				1900u
19. bis(2-chloroethoxy) methane	1300u				5700u
20. hexachlorobutadiene	1800u				7900u
21. hexachlorocyclopentadiene	35000u				150,000u
22. isophorone	440u				1900u
23. napthalene	300u				1300u
24. nitrobenzene	1800u				7900u
25. N-nitrosodimethylamine	880u				3900u
26. N-nitrosodiphenylamine	1300u				5700u
27. N-nitrosodi-n-propylamine	1800u				7900u
28. bis(2-ethyl hexyl) phthalate	1320u				5800u
29. butyl benzyl phthalate	220u				970u
30. di-n-butyl phthalate	260u				1100u
31. di-n-octyl phthalate	2200u				9700u
32. diethyl phthalate	440u				1900u
33. dimethyl phthalate	440u				1900u
34. benzo(a)anthracene	4400u				190,000u
35. benzo(a)pyrene	13000u				57000u
36. 3,4-benzofluroanthene	3500u				15000u
37. benzo(k)fluoranthene	3500u				15000u
38. chrysene	4400u				19000u

BASE/NEUTRAL COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: Jon Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 5-27-82

SAMPLE # :	composite of 29000, 29001 and 29002				29004		
UNITS :	ug/l				ug/kg		
LOQ :							
1. acenaphthene	880u				3900u		
2. benzidine	6600u				290,000u		
3. 1,2,4-trichlorobenzene	1320u				5900u		
4. hexachlorobenzene	2200u				9700u		
5. hexachloroethane	1760u				7700u		
6. bis(2-chloroethyl) ether	880u				3900u		
7. 2-chloronapthalene	880u				3900u		
8. 1,2-dichlorobenzene	440u				1900u		
9. 1,3-dichlorobenzene	440u				1900u		
10. 1,4-dichlorobenzene	440u				1900u		
11. 3,3'-dichlorobenzidine	22000u				97000u		
12. 2,4-dinitrotoluene	6600u				29000u		
13. 2,6-dinitrotoluene	6600u				29000u		
14. 1,2-diphenylhydrazine (as azobenzene)	440u				1900u		
15. fluroanthene	880u				3900u		
16. 4-chlorophenyl phenyl ether	8800u				3900u		

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: Idaho-EPA COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: ASG DATE: 8-25-82

VOA FRACTION:	SAMPLE # :	29000	29001	29002					
CAS #	NAME	3/4	8/12	0/0					
1. 67-64-1	Acetone	+	+	ND					
2. 78-93-3	2-butanone	+	+	↓					
3. 108-10-1	4-methyl-2-pentanone	+	+	↓					
4. 123-72-8	butanal	ND	+	↓					
5. 141-78-6	Acetic Acid, Ethyl Ester	↓	+	↓					
6. 123-86-4	butyl ester of Acetic acid	↓	+	↓					
7. —	xylene	↓	+	↓					
8.									
9.									
10.									

VOLATILES(Continued)

PROJECT: Idaho-EPA COMPILED BY: J N Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: ajb DATE: 8-25-82

	SAMPLE # :	29000	29001	29002					
	UNITS :	ug/l	ug/l	ug/l					
	LOQ :								
23.	dichlorobromomethane	20u	20u	20u					
24.	trichlorofluoromethane	↓	↓	↓					
25.	dichlorodifluoromethane	↓	↓	↓					
26.	chlorodibromomethane	↓	↓	↓					
27.	tetrachloroethylene	↓	↓	↓					
28.	toluene	(20m)	(18D)	↓					
29.	trichloroethylene	20u	(20m)	↓					
30.	vinyl chloride	↓	20u	↓					

VOLATILES

PROJECT: Idaho-EPA COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-25-82

	SAMPLE # :	29000	29001	29002
	UNITS :	ug/l	ug/l	ug/l
	LOQ :			
1.	acrolein	100u	100u	100u
2.	acrylonitrile	50u	50u	50u
3.	benzene	20u	20u	20u
4.	carbon tetrachloride	↓	↓	↓
5.	chlorobenzene	↓	↓	↓
6.	1,2-dichloroethane	↓	↓	↓
7.	1,1,1-trichloroethane	20 M	36	↓
8.	1,1-dichloroethane	20u	20u	↓
9.	1,1,2-trichloroethane	↓	↓	↓
10.	1,1,2,2-tetrachloroethane	↓	↓	↓
11.	chloroethane	↓	↓	↓
12.	2-chloroethylvinyl ether	↓	↓	↓
13.	chloroform	20 M	20 M	↓
14.	1,1-dichloroethylene	20u	20u	↓
15.	1,2-trans-dichloroethylene	↓	↓	↓
16.	1,2-dichloropropane	↓	↓	↓
17.	1,3-dichloropropylene	↓	↓	↓
18.	ethylbenzene	↓	190	↓
19.	methylene chloride	1100	68	↓
20	methyl chloride	20u	20u	↓
21.	methyl bromide	↓	↓	↓
22.	bromoform	↓	↓	↓

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: AJS DATE: 8-26-82

ACID / BN FRACTION SAMPLE # :	composite of 29000, 29001 and 29002					29004		
CAS # NAME	4/114					3/113		
1. 100-41-4 Ethylbenzene	+					+		
2. 108-38-3 meta Xylene	+					+		
3. 696-29-7 (1-methylethyl)-cyclohexane	+					−		
4. 1795-16-0 decyl-cyclohexane	+					+		
5.								
6.								
7.								
8.								
9. RIC shows evidence of Lub oil in sample	+					+		
10.								

ACID COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: Jill Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: AB DATE: 8-27-82

SAMPLE # :	composite 29000, 29001 and 29002				29004		
UNITS :	ug/l				ug/Kg		
LOQ :							
1. 2,4,6-trichlorophenol	600u				26000u		
2. p-chloro-m-cresol	2000u				11000u		
3. 2-chlorophenol	880u				3800u		
4. 2,4-dichlorophenol	2400u				11000u		
5. 2,4-dimethyl phenol	4500u				20000u		
6. 2-nitrophenol	7500u				33000u		
7. 4-nitrophenol	48000u				210000u		
8. 2,4-dinitrophenol	57000u				250000u		
9. 4,6-dinitro-o-cresol	19000u				84000u		
10. pentachlorophenol	57000u				250000u		
11. phenol	880u				3900u		

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composite 2900	2900	2904
UNITS :	ug/l	and 2902	ug/Kg
LOQ :			
39. acenaphthylene	400 u		1800 u
40. anthracene / phenanthrene	(1400)		(37000)
41. benzo(ghi)perylene	4400 u		19000 u
42. fluorene	880 u		3900 u
43. ~~phenanthrene~~	—		—
44. dibenzo(a,h)anthracene	80000 u		350000 u
45. ideno(1,2,3-cd)pyrene	70000 u		310000 u
46. pyrene	880 u		3900 u
47. TCDD	ND		ND

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composited 29003, 29004 and 29002	29004
UNITS :	ug/l	ug/kg
LOQ :		
17. 4-bromophenyl phenyl ether	3080u	140000u
18. bis(2-chloroisopropyl) ether	440u	19000u
19. bis(2-chloroethoxy) methane	1300u	57000u
20. hexachlorobutadiene	1800u	79000u
21. hexachlorocyclopentadiene	35000u	150000u
22. isophorone	440u	19600u
23. napthalene	300u	13000u
24. nitrobenzene	1800u	79000u
25. N-nitrosodimethylamine	880u	39000u
26. N-nitrosodiphenylamine	1300u	57000u
27. N-nitrosodi-n-propylamine	1800u	79000u
28. bis(2-ethyl hexyl) phthalate	1320u	58000u
29. butyl benzyl phthalate	220u	9700u
30. di-n-butyl phthalate	260u	11000u
31. di-n-octyl phthalate	2200u	97000u
32. diethyl phthalate	440u	19000u
33. dimethyl phthalate	440u	19000u
34. benzo(a)anthracene	4400u	190000u
35. benzo(a)pyrene	13000u	570000u
36. 3,4-benzofluroanthene	3500u	150000u
37. benzo(k)fluoranthene	3500u	150000u
38. chrysene	4400u	19000u

BASE/NEUTRAL COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-92

LABORATORY: EPA Region X REVIEWED BY: ACB DATE: 5.7-92

SAMPLE # :	Composited 29003 29001 and 29002				29004		
UNITS :	ug/L				ug/Kg		
LOQ :							
1. acenaphthene	880u				3900u		
2. benzidine	17000u				78000u		
3. 1,2,4-trichlorobenzene	1320u				5400u		
4. hexachlorobenzene	2200u				9700u		
5. hexachloroethane	1760u				7700u		
6. bis(2-chloroethyl) ether	880u				3900u		
7. 2-chloronapthalene	880u				3900u		
8. 1,2-dichlorobenzene	440u				1900u		
9. 1,3-dichlorobenzene	440u				1900u		
10. 1,4-dichlorobenzene	440u				1900u		
11. 3,3'-dichlorobenzidine	22000u				97000u		
12. 2,4-dinitrotoluene	6600u				29000u		
13. 2,6-dinitrotoluene	6600u				29000u		
14. 1,2-diphenylhydrazine (as azobenzene)	440u				1900u		
15. fluroanthene	880u				3900u		
16. 4-chlorophenyl phenyl ether	8800u				39000u		

EPA REGION 10 LABORATORY

PRIORITY POLLUTANTS DATA REPORT

LAB NO 29004 GmB

STORET NO

DATE/TIME 7/22/82 1pm

STATION NAME CR225488

STATION LOCATION Moscow, ID

FLOW

MEDIA: WATER

ANALYSIS BY:

DATE:

% SOLIDS:

L305 LEAD

METALS (UG/L)

01097 ANTIMONY
01002 ARSENIC
01012 BERYLLIUM
01027 CADMIUM
01034 CHROMIUM
01042 COPPER
01051 LEAD
71900 MERCURY
01067 NICKEL
01147 SELENIUM
01077 SILVER
01059 THALLIUM
01092 ZINC

MISCELLANEOUS (UG/L)

00720 CYANIDE (MG/L)
32730 PHENOLICS (AMP)
34225 ASBESTOS

PESTICIDES (UG/L)

8-10-82 by DC/EC 24h

39330 ALDRIN
39350 CHLORDANE
39380 DIELDRIN
39300 4,4 DDT
39320 4,4 DDE
39310 4,4 DDD
34361 ALPHA ENDOSULFAN
34356 BETA ENDOSULFAN
34351 ENDOSULFAN SULFATE
39390 ENDRIN
34366 ENDRIN ALDEHYDE
39410 HEPTACHLOR
39420 HEPTACHLOR EPOXIDE
39337 ALPHA BHC
39338 BETA BHC
39340 GAMMA BHC (LINDANE)
34259 DELTA BHC
39400 TOXAPHENE 0.16 µ
34671 PCB 1016 0.052µ
39488 PCB 1221
39492 PCB 1232
39496 PCB 1242
39500 PCB 1248
39504 PCB 1254

BASE/NEUTRAL EXTRACTIBLES (UG/L)

34205 ACENAPHTHENE
39120 BENZIDINE
34551 1,2,4-TRICHLOROBENZENE
39700 HEXACHLOROBENZENE
34396 HEXACHLOROETHANE
34273 BIS(2-CHLOROETHYL) ETHER
34581 2-CHLORONAPHTHALENE
34536 1,2-DICHLOROBENZENE
34566 1,3-DICHLOROBENZENE
34571 1,4-DICHLOROBENZENE
34631 3,3-DICHLOROBENZIDINE
34611 2,4-DINITROTOLUENE
34626 2,6-DINITROTOLUENE
34346 1,2-DIPHENYLHYDRAZINE
34376 FLUORANTHENE
34641 4-CHLOROPHENYL PHENYL ETHER
34636 4-BROMOPHENYL PHENYL ETHER
34283 BIS(2-CHLOROISOPROPYL)ETHER
34278 BIS(2-CHLOROETHOXY) METHANE
39702 HEXACHLOROBUTADIENE
34386 HEXACHLOROCYCLOPENTADIENE
34408 ISOPHORONE
34696 NAPHTHALENE
34447 NITROBENZENE
34438 N-NITROSODIMETHYLAMINE
34428 N-NITROSODI-N-PROPYLAMINE
34433 N-NITROSODIPHENYLAMINE
39100 BIS(2-ETHYLHEXYL) PHTHALATE
34292 N-BUTYL BENZYL PHTHALATE
39110 DI-N-BUTYL PHTHALATE
34596 DI-N-OCTYL PHTHALATE
34336 DIETHYL PHTHALATE
34341 DIMETHYL PHTHALATE
34526 BENZO(A)ANTHRACENE
34247 BENZO(A)PYRENE
34230 BENZO(B)FLUORANTHENE
34242 BENZO(K)FLUORANTHENE
34320 CHRYSENE
34200 ACENAPHTHYLENE
34220 ANTHRACENE
34521 BENZO (GHI) PERYLENE
34381 FLUORENE
34461 PHENANTHRENE
34556 1,2,5,6-DIBENZANTHRACENE
34403 INDENO(1,2,3-CD)PYRENE
34469 PYRENE
34675 TCDD

ACID EXTRACTIBLES (UG/L)

34621 2,4,6-TRICHLOROPHENOL
34452 P-CHLORO-M-CRESOL
34586 2-CHLOROPHENOL
34601 2,4-DICHLOROPHENOL
34606 2,4-DIMETHYLPHENOL
34591 2-NITROPHENOL
34646 4-NITROPHENOL
34616 2,4-DINITROPHENOL
34657 4,6-DINITRO-O-CRESOL
39032 PENTACHLOROPHENOL
34694 PHENOL

VOLATILE ORGANICS (UG/L)

34210 ACROLEIN
34215 ACRYLONITRILE
34030 BENZENE
32102 CARBON TETRACHLORIDE
34301 CHLOROBENZENE
32103 1,2-DICHLOROETHANE
34506 1,1,1-TRICHLOROETHANE
34496 1,1-DICHLOROETHANE
34511 1,1,2-TRICHLOROETHANE
34516 1,1,2,2-TETRACHLOROETHANE
34311 CHLOROETHANE
32106 CHLOROFORM
34501 1,1-DICHLOROETHYLENE
34546 1,2-TRANS-DICHLOROETHYLENE
34541 1,2-DICHLOROPROPANE
34704 CIS-1,3-DICHLOROPROPENE
34699 TRANS-1,3-DICHLOROPROPENE
34371 ETHYLBENZENE
34423 METHYLENE CHLORIDE
34418 METHYL CHLORIDE
34413 METHYL BROMIDE
32104 BROMOFORM
32101 BROMODICHLOROMETHANE
34488 TRICHLOROFLUOROMETHANE
34668 DICHLORODIFLUOROMETHANE
32105 DIBROMOCHLOROMETHANE
34475 TETRACHLOROETHYLENE
34010 TOLUENE
34488 TRICHLOROETHYLENE
32175 VINYL CHLORIDE
34268 BIS(CHLOROMETHYL) ETHER
34576 2-CHLOROETHYL VINYL ETHER

EPA REGION 10 LABORATORY

PRIORITY POLLUTANTS DATA REPORT

MEDIA: SEDIMENT

LAB NO 29000, 29001 + 29002

STATION NAME: _____

ANALYSIS BY: _____

STORET NO: _____ Composite

STATION LOCATION: _____

DATE: _____

DATE/TIME: _____

FLOW: _____

% SOLIDS: _____

METALS (MG/KG) (DRY)

01000	ANTIMONY		
01003	ARSENIC		
01013	BERYLLIUM		
01028	CADMIUM	(WET)	
01029	CHROMIUM		
01043	COPPER	(WET)	
01052	LEAD		
71921	MERCURY		
01068	NICKEL		
01148	SELENIUM		
01078	SILVER		
34480	THALLIUM		
01093	ZINC	(WET)	

MISCELLANEOUS (MG/KG)

00721	CYANIDE	(DRY)
32731	PHENOLICS (AAP)	
34220	ASBESTOS (UG/KG)	

PESTICIDES (UG/KG)

39333	~~0.364~~ ALDRIN	(DRY)
39351	CHLORDANE	(DRY)
39383	DIELDRIN	(DRY)
39301	4,4'DDT	(DRY)
39321	4,4'DDE	(DRY)
39311	4,4'DDD	(DRY)
34364	ALPHA ENDOSULFAN	
34359	BETA ENDOSULFAN	
34354	ENDOSULFAN SULFATE	
39393	ENDRIN	(DRY)
34369	ENDRIN ALDEHYDE	
39412	HEPTACHLOR	(DRY)
39423	HEPTACHLOR EPOXIDE	(DRY)
39076	ALPHA BHC	(DRY)
34257	BETA BHC	
39343	GAMMA BHC	(LINDANE)
34262	DELTA BHC	
39403	22.4 TOXAPHENE	(DRY)
39514	7.34 PCB 1016	(DRY)
39491	PCB 1221	(DRY)
39495	PCB 1232	(DRY)
39499	PCB 1242	(DRY)
39503	PCB 1248	(DRY)
39507	PCB 1254	(DRY)
39511	PCB 1260	(DRY)

BASE NEUTRAL EXTRACTIBLES (~~UG/KG~~ mg/Kg)

34208	ACENAPHTHENE	
39121	BENZIDINE	(DRY)
34554	1,2,4-TRICHLOROBENZENE	
39701	HEXACHLOROBENZENE	(DRY)
34399	HEXACHLOROETHANE	
34276	BIS(2-CHLOROETHYL) ETHER	
34584	2-CHLORONAPHTHALENE	
34539	1,2-DICHLOROBENZENE	
34569	1,3-DICHLOROBENZENE	
34574	1,4-DICHLOROBENZENE	
34634	3,3-DICHLOROBENZIDINE	
34614	2,4-DINITROTOLUENE	
34629	2,6-DINITROTOLUENE	
34349	1,2-DIPHENYLHYDRAZINE	
34379	FLUORANTHENE	
34644	4-CHLOROPHENYL PHENYL ETHER	
34639	4-BROMOPHENYL PHENYL ETHER	
34286	BIS(2-CHLOROISOPROPYL)ETHER	
34281	BIS(2-CHLOROETHOXY) METHANE	
39705	HEXACHLOROBUTADIENE	
34389	HEXACHLOROCYCLOPENTADIENE	
34411	ISOPHORONE	
34445	NAPHTHALENE	
34450	NITROBENZENE	
34441	N-NITROSODIMETHYLAMINE	
34431	N-NITROSODI-N-PROPYLAMINE	
34436	N-NITROSODIPHENYLAMINE	
39102	BIS(2-ETHYLHEXYL) PHTHALATE	(DRY
34295	N-BUTYL BENZYL PHTHALATE	
39112	DI-N-BUTYL PHTHALATE	(DRY
34599	DI-N-OCTYL PHTHALATE	
34339	DIETHYL PHTHALATE	
34344	DIMETHYL PHTHALATE	
34529	BENZO(A)ANTHRACENE	
34250	BENZO(A)PYRENE	
34233	BENZO(B)FLUORANTHENE	
34245	BENZO(K)FLUORANTHENE	
34323	CHRYSENE	
34203	ACENAPHTHYLENE	
34223	ANTHRACENE	
34524	BENZO (GHI) PERYLENE	
34384	FLUORENE	
34464	PHENANTHRENE	
34559	1,2,5,6-DIBENZANTHRACENE	
34406	INDENO(1,2,3-C,D)PYRENE	
34472	PYRENE	
34678	TCDD	

ACID EXTRACTIBLES (~~UG/KG~~ mg/Kg)

34624	2,4,6-TRICHLOROPHENOL
34455	P-CHLORO-M-CRESOL
34589	2-CHLOROPHENOL
34604	2,4-DICHLOROPHENOL
34609	2,4-DIMETHYLPHENOL
34594	2-NITROPHENOL
34649	4-NITROPHENOL
34619	2,4-DINITROPHENOL
34660	4,6-DINITRO-O-CRESOL
39061	PENTACHLOROPHENOL (DRY)
34695	PHENOL (C6H5OH)

VOLATILE ORGANICS (~~UG/KG~~)

34213	ACROLEIN
34219	ACRYLONITRILE
34237	BENZENE
34299	CARBON TETRACHLORIDE
34304	CHLOROBENZENE
34534	1,2-DICHLOROETHANE
34509	1,1,1-TRICHLOROETHANE
34499	1,1-DICHLOROETHANE
34514	1,1,2-TRICHLOROETHANE
34519	1,1,2,2-TETRACHLOROETHANE
34314	CHLOROETHANE
34319	CHLOROFORM
34504	1,1-DICHLOROETHYLENE
34549	1,2-TRANS-DICHLOROETHYLENE
34544	1,2-DICHLOROPROPANE
34702	CIS-1,3-DICHLOROPROPENE
34697	TRANS-1,3-DICHLOROPROPENE
34374	ETHYLBENZENE
34426	METHYLENE CHLORIDE
34421	METHYL CHLORIDE
34416	METHYL BROMIDE
34290	BROMOFORM
34330	BROMODICHLOROMETHANE
34491	TRICHLOROFLUOROMETHANE
34334	DICHLORODIFLUOROMETHANE
34309	DIBROMOCHLOROMETHANE
34478	TETRACHLOROETHYLENE
34483	TOLUENE
34487	TRICHLOROETHYLENE
34425	VINYL CHLORIDE
34271	BIS(CHLOROMETHYL) ETHER
34573	2-CHLOROETHYL VINYL ETHER

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

FIGURE 5
CHAIN OF CUSTODY RECORD

(Appropriate Address)

EPA EXHIBIT 23 - IDAHO

Proj. No.: | Project Name: Argon / Pressler, Post Falls, Idaho

SAMPLERS (Signature): Athena K. Lalikos, Mike Brown

STA. NO. Lab #	DATE 1982	TIME	COMP.	GRAB	STATION LOCATION	NO OF CONTAINERS	REMARKS
29000	07-20	10/11:00		X	Near Holding tank	1/40 ml	CR vv5479 Petroleum mixture - gr surface
29001	"	"		X	Near Holding tank	1/40 ml	CR vv5480 Petroleum mixture - gr. surface
29002	"	"		X	Near Holding tank	1/40 ml	CR vv5481 Petroleum mixture - gr surface
29003	"	"		X	Underreach/ Loading Rack	1 pint	CR vv5482 Soil
29004	"	"		X	Inside/ underground sump	1 pint	CR vv5483 Oil

Relinquished by (Signature)	Date/Time	Received by (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Athena K. Lalikos	07-29 / 8 v				
Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Relinquished by: (Signature)	Date/Time	Received for Laboratory by: (Signature) K. D. Pieck	Date/Time 9-5-82 / 1245	Remarks	

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

FIELD SAMPLE DATA SHEET

DATE RECEIVED: 82 07 20 (YR. MO. DY.)

LOCATION: Amon/Dreyler Rathdrum, Idaho

PROJECT SUPERVISOR: Athena K Lalikos / Mike Brown

SEND DATA TO: Athena K Lalikos / Mike Brown

NOTES: ~~Coal samples 29000, 29001 & 29002 analyze metals Priority Pollutant scan~~ disregard with other ~~Contact M. Brown (442-7552)~~ Expedite - Ron Blair

L 305 LMIC

CREW: BAH 8-6-82

RECORDER

[X] POSSIBLE HAZARDOUS OR TOXIC MATERIAL

ENFORCEMENT [ ]

EPA EXHIBIT 24-IDAHO

CARD	MEDIA: WATER	SEDIMENT	TISSUE	GLOVES	PRESERVATION: UNPRES	H_2SO_4	HNO_3	ICED	FROZEN	LAB NUMBER	STORET STATION	DATE: YR	MO	DY	TIME	COMPOSITE ONLY: ENDING DATE MO	DY	TIME	# GRAB	DEPTH	UNITS	TYPE	STATION NAME
1	X									29000		82	07	20	10/11:00								CR 22479 - jr surface
1	X									29001		82	07	20									CR 22480 jr surface
1	X									29002		82	07	20									CR 22481 jr surface
1		X								29003		82	07	20									CR 22482 - Loading dock
1	X									29004		82	07	20									CR 22483 - Sump
1																							
1																							
1																							
1																							
1				X						29010													Disposable Gloves

USE "C" FOR CONTINUOUS

CARD	LAB NUMBER	%FROM RIGHT BANK	TEMP. °C	D.O. BOTTLE #	D.O. mg/l	pH	COND. umho/Cm	TOTAL ALK. mg/l	TURBIDITY FTU	FLOW	UNITS	GAGE HEIGHT FEET
2												
2												
2												
2												
2												
2												
2												
2												
2												
2												

LEGEND

DEPTH UNITS: F-FEET M-METERS

DEPTH TYPE: BLANK FOR REGULAR I-INTEGRATED B-BOTTOM

FLOW UNITS: C-CFS M-MGD G-GPM

(S) LOOKING UPSTREAM

COPY

United States
Environmental Protection
Agency

Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10096
Helena, Montana 59601

EPA

AUG 03 1982

Ref: 8MO

Mr. Michael Brown
EPA, Region X
1200 6th Ave.
Mail Stop 533
Seattle, WA 98101

Dear Mike:

Concerning our recent conversation about Arrcom Oil, I nave enclosed a copy of an exception report from Anaconda Aluminum, a letter from the Montana Solid Waste Management Bureau and a Waste Manifest.

The incident which generated these documents was a waste shipment from Anaconda Aluminum, Columbia Falls, Montana to Arrcom Oil in Rathdrum, Idaho. Anaconda contacted the State when the hazardous waste manifest was not returned from Arrcom.

I will keep looking for any other information which may be of value to you.

Sincerely yours,

Jim Harris

James C. Harris
Environmental Engineer

Enclosure

EPA EXHIBIT
25-IDAHO

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
SOLID WASTE MANAGEMENT BUREAU

TED SCHWINDEN, GOVERNOR
COGSWELL BUILDING, ROOM A201

STATE OF MONTANA

(406) 449-2821
HELENA, MONTANA 59620

FILE

May 14, 1981

Ken Reick
Environmental Engineer
Anaconda Aluminum Division
P. O. Box 10
Columbia Falls, MT 59912

Dear Ken;

Enclosed is the signed original of the hazardous waste manifest, serial number 1520, for which you filed an exception report April 15, 1981. I spoke with Mr. Michael Schuler by phone on May 7, 1981 and received this manifest from him on May 11, 1981.

I have already provided the Montana Office of Region VIII EPA with a copy, so we may all close our files on this matter. We appreciate your cooperation in reporting this manifest exception in a timely manner.

Sincerely,

Roger Thorvilson

ROGER C. THORVILSON
Solid Waste Management Bureau
Environmental Sciences Division

RCT:vc
Encls.
cc: Jim Harris, Montana EPA Office, Helena, MT

ANACONDA Aluminum Company
Columbia Falls Reduction Plant
P.O. Box 10
Columbia Falls, Montana 59912
Telephone 406 892 3261

April 15, 1981

Mr. Alan Merson
U.S. Environmental Protection Agency
Region VIII Administrator
8 AH-WM (ON)
1860 Lincoln Street
Denver, Colorado 80295

MTD057561763

Dear Mr. Merson:

This report is being submitted in accordance with 40 CFR 262.42 (Exception Reporting) as promulgated on May 19, 1980. It concerns a shipment of hazardous waste generated at the Anaconda Aluminum Company, Columbia Falls, Montana, Primary Aluminum Reduction Plant, and shipped from here on February 26, 1981.

As of April 13, 1981, the Columbia Falls plant had not received from the designated T/S/D facility a copy of the manifest accompanying this shipment. Attempts have been made to determine the disposition of this waste material through telephone conversations with the transporter and designated T/S/D facility. These attempts have not been successful. However, on April 14, 1981, the designated facility did inform us that a copy of the manifest is in the mail. We have not yet received it.

Please find attached, a copy of Manifest No. 1520. If you need further information, please contact us.

Sincerely yours,

ANACONDA ALUMINUM COMPANY

K. G. Reick
Environmental Engineer

KGR:hcp
Attachment

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUM
1520

TO: T/S/D/F Arrcom Oil	FROM: Generator Anaconda Aluminum Company
E.P.A. ID Code No. 00-080-0961	E.P.A. ID Code No. MT D057561763
Address Rural Rt. No. 3, Box 258 A 6	Address P.O.Box10, Columbia Falls, Mt. 59912
Destination Rathdrum, Id. 83858	Origin
Phone 208-687-0216	Phone 406-892-3261

No. Shipping Units	D O T PROPER SHIPPING NAME	HAZARD CLASS	Haz. Matl. ID No.	EPA Haz. Waste No.	WEIGHT	LABELS REQUIRE (or Exemption N
1	Waste Solvent Solution	Combustible	NA 1993	F001 F005	4370 lb 610 gal	None

PLACARDS REQUIRED None

ALTERNATE DESTINATION (EMERGENCY ONLY)

T/S/D/F Arrcom Oil
E.P.A. ID Code No. 00-080-0961
Address Rural Rt. No. 3, Box 258 A 6
Destination Rathdrum, Id. 83858

EMERGENCY RESPONSE INFORMATION

CONTACT Name Tom Drexler
Phone 208-687-0607
National Response Center 1-800-424-8802
in D. C. 426-2675

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Generator Signature [signature] Date 2-26-81

TRANSPORTER #1 Arrcom Oil E.P.A. ID No. 00-080-0961

Address R.R. #3, Box 258 A 6

City Rathdrum State Idaho Zip 83858 Phone 208-687-0607

This is to certify acceptance of the hazardous waste shipment.

Transporter No. 1 Signature [signature] Date 2/26/81

TREATMENT/STORAGE/DISPOSAL/FACILITY

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.

T/S/D/F Signature [signature] Date 2-28-81

DREXLER ENTERPRISES, INC.
Rt. 3, Box 258-A6

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO
ATTN OF: M/S 613

December 27, 1982

Mr. George W. Drexler
3731 N. 29th Street
Tacoma, Washington 98402

Re: Inspection of Records

Dear Mr. Drexler:

This is to advise you that in the immediate future, EPA employees will be inspecting records subpoenaed from you (or from companies in which you hold an interest), and presently held at the U. S. Attorney's Office in Seattle. As you know, under EPA regulations and the Resource Conservation and Recovery Act (RCRA), EPA has the right to inspect records required to be maintained for hazardous waste purposes, regardless of their location.

In particular, EPA will be reviewing the subpoenaed records for hazardous waste manifests.

Although the records came into the possession of the Government by Grand Jury subpoena, the records themselves are not "matters occurring before the grand jury" which are privileged under Federal Criminal Rule 6(e).

After the records have been inspected, EPA may request copies of them.

Sincerely,

John A. Hamill

John A. Hamill
Assistant Regional Counsel

cc: Mike Brown
Stephen Schroeder
John Gordon

EPA EXHIBIT
26- IDAHO